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7 *Attorney for Plaintiff, U.S. Bank Trust, N.A., as Trustee for LSF8 Master Participation Trust*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 U.S. BANK TRUST, N.A., AS TRUSTEE FOR
LSF8 MASTER PARTICIPATION TRUST,

11 Plaintiff,

12 vs.

13 FODOR FAMILY TRUST

14 Defendant

Case No.: 2:18-cv-00077-GMN-GWF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND
DISPOSITIVE MOTION DEADLINES**

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16 COMES NOW, Plaintiff, U.S. BANK TRUST, N.A., AS TRUSTEE FOR LSF8 MASTER
PARTICIPATION TRUST. (“Plaintiff” or “U.S. Bank”), by and through its attorneys of record, Edgar C.
17 Smith, Esq., and Rock K. Jung, Esq. of the law firm of Wright, Finlay & Zak, LLP, and Defendant,
18 FODOR FAMILY TRUST (hereinafter “Fodor”), by and through its counsel of record, Michael F. Bohn,
19 Esq. and Adam R. Trippiedi, Esq. of the Law Offices of Michael F. Bohn, Esq., Ltd., and hereby stipulate
20 and agree to extend discovery and dispositive motion deadlines.

21 **A. DISCOVERY COMPLETED**

- 22 1. Plaintiffs’ Initial, First and Second Supplemental Disclosures.
23 2. Plaintiff’s Subpoena Duces Tecum to Palo Verde Homeowners Association and Kirby C.
24 Gruchow, Jr., Esq. of Leach Johnson Song & Gruchow.

3. Defendant Fodor Family Trust's written discovery (interrogatories, requests for production and requests for admission) to Plaintiff.

4. Defendant Fodor Family Trust's Initial Disclosures.

5. Plaintiff's responses to Fodor Family Trust's written discovery (requests for production, requests for admission, interrogatories).

6. Plaintiff's Expert Disclosure

7. Plaintiff's written discovery (interrogatories, requests for production and requests for admission) to Fodor Family Trust.

8. Defendant Fodor Family Trust's responses to Plaintiffs' written discovery (requests for production, requests for admission, interrogatories).

9. Deposition of Kirby C. Gruchow, Jr., Esq. of Leach Johnson Song & Gruchow.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

1. Deposition of Defendant Fodor Family Trust.

2. Deposition of Palo Verde Circle Trust.

3. Deposition of Palo Verde Homeowners Association, Inc.

Plaintiff's written discovery (interrogatories, requests for production and requests for admission) to Palo Verde Homeowners Association, Inc..

C. REASON WHY DISCOVERY HAS NOT BEEN COMPLETED

Good cause and excusable neglect justify an extension of the deadlines at this time. Plaintiff recently filed its First Amended Complaint on July 12, 2018 which brought in a new Defendant, Palo Verde Homeowners Association, Inc. ("HOA"). The HOA was recently served on July 23, 2018. It is anticipated that the HOA will be desirous of participating and completing discovery of their own.

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D. PROPOSED PRE-TRIAL DEADLINES AND DISCOVERY SCHEDULE

EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off	August 15, 2018	December 14, 2018
Motions to Amend Pleadings/Add Parties	May 17, 2018	N/A
Expert Disclosures	June 18, 2018	N/A
Rebuttal Expert Disclosures	July 16, 2018	N/A
Dispositive Motions	September 14, 2018	January 14, 2019
Joint Pre-Trial Order	October 15, 2018	April 12, 2019

E. CURRENT TRIAL DATE

A trial date is not currently set for this matter.

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1 **F. CONCLUSION**

2 Accordingly, for good cause shown and excusable neglect, the parties respectfully request that the
3 Court enter the accompanying order to extend the aforementioned discovery and dispositive motion
4 deadlines in this matter.

5 IT IS SO STIPULATED.

6 DATED this 25th day of July, 2018.

7 **WRIGHT, FINLAY & ZAK, LLP**

8 /s/ Rock K. Jung, Esq.
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14 **ORDER**

15 **IT IS SO ORDERED.**

16 George Foley Jr.
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 7/26/2018